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**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

DIANA TAIT and NANCY  
WENTWORTH, individually and on  
behalf of all others similarly situated,

PLAINTIFFS,

vs.

BSH HOME APPLIANCES  
CORPORATION, a Delaware  
Corporation,

DEFENDANT.

BEVERLY GIBSON and SHARON  
COBB, individually and on behalf of  
all others similarly situated,

PLAINTIFFS,

Case No. SACV10-711 CJC (ANx)

**CLASS ACTION**

**PLAINTIFF'S NOTICE OF  
MOTION AND MOTION TO  
CONSOLIDATE RELATED CASES  
AND TO APPOINT INTERIM  
LEAD COUNSEL**

**DATE: JANUARY 3, 2011**

**TIME: 1:30 P.M.**

**COURTROOM: 9B**

**JUDGE: HON. CORMAC J. CARNEY**

1 vs.

2 BSH HOME APPLIANCES  
3 CORPORATION, a Delaware  
4 Corporation,

5 DEFENDANT.

6  
7 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

8 PLEASE TAKE NOTICE THAT on January 3, 2011 at 1:30 p.m., or as  
9 soon as counsel may be heard in Department 9-B of the United States Courthouse  
10 located at 411 W. Fourth Street, Santa Ana, California, pursuant to Fed. R. Civ. P.  
11 42, Plaintiffs Diana Tait, Nancy Wentworth, Beverly Gibson and Sharon Cobb  
12 (“Plaintiffs”) will, and hereby do, move to consolidate all related actions against  
13 Defendant BSH Home Appliances Corporation (“BSH” or “Bosch”) pending in  
14 this District Court, to approve Plaintiffs’ choice of counsel as Plaintiffs’ Interim  
15 Co-Lead Counsel, and to order the filing of a Consolidated Amended Complaint.

16 **This Motion is made following the conference of counsel pursuant to**  
17 **Local Rule 7-3 which began on November 15, 2010 via correspondence.**

18 This Motion is based upon this Notice of Motion and Motion, the attached  
19 Memorandum of Points and Authorities, the Declarations of Stuart. M.  
20 Eppsteiner, Jordan L. Lurie, and Paul Weiss, the pleadings and other files herein,  
21 and such other written and oral argument as may be permitted by the Court at the  
22 time of the hearing.

1 DATED: December 6, 2010

**EPPSTEINER & FIORICA**  
**ATTORNEYS, LLP**  
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3  
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*Gibson Counsel*

*Counsel for Plaintiffs and the Class*